

# Sage Legal LLC

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April 26, 2024

## VIA ECF

United States District Court  
Eastern District of New York  
Attn: Hon. Robert M. Levy, U.S.M.J.  
225 Cadman Plaza East  
Courtroom 11B South  
Brooklyn, NY 11201-1804

**Re: Hashimi v. Bicu's Playground LLC, et ano.**  
**Case No.: 1:24-cv-1571 (EK) (RML)**

Dear Judge Levy:

This firm represents the Defendants in the above-referenced case, who respectfully submit this letter motion in accordance with ¶ 2(E) of this Court's Individual Motion Practices and Rules (hereinafter the "Individual Rules") to respectfully request a forty-five (45) day extension of time to respond to Plaintiff's Complaint, ECF Docket Entry [1](#).

Consistent with the Individual Rules, Defendants respectfully submit that: (i) the original date of the deadline to respond to the complaint is unclear based on the docket and your undersigned has not been able to ascertain the date that Defendants were each served; (ii) the reason for the request is to permit Defendants to investigate the claims made in the complaint; (iii) a forty-five (45) day extension of time is sought; (iv-v) there have been no previous requests for an extension of time to respond to the complaint; and (vi) the adversary consents to the requested extension.

Defendants thank this honorable Court for its time and attention to this case.

Dated: Jamaica, New York  
April 26, 2024

Respectfully submitted,

**SAGE LEGAL LLC**

By: /s/ Emanuel Kataev, Esq.  
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**VIA ECF**

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**VIA ECF**

United States District Court  
Eastern District of New York  
Attn: Hon. Eric R. Komitee, U.S.D.J.  
225 Cadman Plaza East  
Courtroom 6G North  
Brooklyn, NY 11201-1804